

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,  
Plaintiff,

V.

SECURITIES & EXCHANGE COMMISSION,	\$
GTS SECURITIES, LLC, ARI RUBINSTEIN,	\$
NEXT BRIDGE HYDROCARBONS, INC.,	\$
JOHN BRDA, GREGORY McCABE, FINANCIAL	\$
INDUSTRY REGULATORY AUTHORITY	\$
Defendants.	\$

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Case No. 7:24-CV-317-DC-RCG

**DEFENDANT, NEXT BRIDGE HYDROCARBONS, INC.’S**  
**MOTION TO EXTEND PLEADINGS DEADLINE**

TO THE HONORABLE JUDGE OF SAID COURT:

**NOW COMES, NEXT BRIDGE HYDROCARBONS, INC.**, (hereinafter “NBH”), one of the Defendants herein and files this motion seeking an extension of its deadline to answer or otherwise respond to Plaintiff’s Second Amended Complaint (Doc. 3) and would respectfully show the Court as follows:

1. Defendant NBH's deadline to respond to Plaintiff's Second Amended Complaint is May 8, 2025. The Second Amended Complaint spans 78 pages and over 284 paragraphs, names dozens of defendants, and purports to allege eight causes of action in addition to declaratory relief and injunctive relief.
2. Defendant NBH anticipates counsel of record for NBH to be withdrawn from the case, and has hired the undersigned, which are working on responsive pleadings and getting up to speed on this case.

3. Defendant McCabe has also recently obtained substituted counsel, and this Court granted his opposed extension of his response deadline to June 16, 2025, and found it reasonable. (Doc. 35).
4. Accordingly, NBH respectfully requests that the Court extend its deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint to June 16, 2025.
5. This is NBH's second request for an extension of time. This extension is not sought for purposes of delay, but so that justice may be done.
6. Undersigned counsel conferred with pro se Plaintiff via electronic mail on or about May 6, 2025, but Plaintiff has not responded.

Dated: May 7, 2025

Respectfully submitted,

/s/ J. Paul Manning

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**ATTORNEYS FOR DEFENDANT NEXT BRIDGE  
HYDROCARBONS, INC.**

**CERTIFICATE OF CONFERENCE**

Pursuant to the Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant NBH, he conferred with Plaintiff Contique Willcot via email on May 6, 2025. Plaintiff has not yet responded.

/s/ J.Paul Manning

J.Paul Manning

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on May 8, 2025.

/s/ J.Paul Manning

J.Paul Manning